

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997)

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS CARL G. DEGEN
(OCA/USPS-T12-12-15)
July 25, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



EMMETT RAND COSTICH

Assistant Director

Office of the Consumer Advocate

OCA/USPS-T12-12. Please refer to lines 151-155 (the KEEP option) of program MBC of LR-H-146.

- a. Please confirm that among the variables kept at this stage of the program are variables F266 and F226. If you do not confirm, please explain how to interpret this SAS "KEEP" option.
- b. Please confirm that this program MBC operates on the FY 1996 IOCS data file contained in LR-H-23. If you do not confirm, please describe all files this program relies upon.
- c. Please confirm that the SAS program that produced the H-23 IOCS file does not output any values for the variables F266 and F226. See pages 5-10 of the printed documentation accompanying the IOCS file. If you do not confirm, please explain and, if necessary, update pages 5-10 of H-23.
- d. Please define the variables F266 and F226.
- e. Are the variables F226 and F266 used in LR-H-146? If so, please describe how they are used.
- f. Do other Postal Service witnesses or library references rely upon the values of F266 and F226? If so, please describe how they are used.

OCA/USPS-T12-13. Please refer to library reference H-23, line 2 of program MOD1DIR. This line sets an error option with the statement "OPTIONS ERRORS=1;". Please explain the purpose of this SAS statement.

OCA/USPS-T12-14. Please refer to lines 43-45 of MOD1DIR or to lines 65-67 of NONMOD12, LR-H-23. These lines contain the following SAS statement:

```
IF 'B'<=F133<='E' OR F133='M'  
OR 'A'<=F9635<='C' OR F9635='K' THEN HANDLING = ' PC_CRD';  
ELSE HANDLING = ' PC_LTR';
```

- a. Please confirm that the variable F9635 contains single piece shape after June 30, and F133 contains single piece shape prior to July 1, 1996. If you do not confirm, please explain the difference between these two shape variables.
- b. Please confirm that an F9635 value of 'A' corresponds to letters, 'B' corresponds to cards, 'C' corresponds to USPS forms, and 'K' corresponds to detached address cards. If you do not confirm, please explain how to interpret H-23, page 44.
- c. Please confirm that an F133 value of 'A' corresponds to letters, and values 'B', 'C', 'D', 'E', and 'M' correspond to cards. If you do not confirm, please explain how to interpret H-23, page 44.
- d. Please explain why the variable HANDLING is set to 'PC_LTR' for letter shaped tallies received prior to July 1, but it is set to 'PC_CRD' for letter shaped tallies received after June 30, 1996.

OCA/USPS-T12-15. Please refer to lines 178-179 of program BMC1, H-23. These lines contain the following SAS statement:

```
IF 'B'<=F133<='E' OR F133='M' THEN HANDLING = ' PC_CRD';  
ELSE HANDLING = ' PC_LTR';
```

- a. Please explain why it is not necessary to check for values of F9635 for BMC tallies in order to assign a value to the variable HANDLING.
- b. Please confirm that this code will assign the value of 'PC_LTR' to the variable HANDLING for all BMC single piece card tallies received after June 30, 1996. If you do not confirm, please explain how the value of HANDLING would be assigned for activity code 1020 (F262=1020), F133=' ', and F9635='B'.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.



EMMETT RAND COSTICH
Attorney

Washington, D.C. 20268-0001
July 25, 1997